*States,* 204 U. S. 364, 27 Sup. Ct. 367, 51 L. Ed. 523; *National Pole Co.* v. *Chicago and N. W. Ry. Co.,* 211 Fed. 65, 127 C. C. A. 561. See also *Field* v. *Clark,* 143 U. S. 649. The court in modifying the order of the Commission gave little discussion to the matter. However an important question is presented. The right of a person to engage in a lawful business can not be placed under the arbitrary and uncontrolled will of an individual or board. *Cicero Lumber Co.* v. *Town of Cicero,* 176 Ill. 9, 42 L. R. A. 693. There is no obligation upon a person to sell his commodities to the public equally and no common law precedent for such can be found. *Great Atlantic and Pacific Tea Co.* v. *Cream of Wheat Co.* (1915), 227 Fed. 46; *Greater New York Film Co.* v. *Biograph Co.,* 203 Fed. 39, 121 C. C. A. 375. See also 14 MICH. L. REV. 228. In 29 HARVARD L. REV. 77, it is suggested that the common law principle that intentional damage without justification is actionable might sustain such an obligation. This however seems untenable and might lead to a return of the unsatisfactory system of government price fixing. 25 Yale L. JOUR. 194. The reason for a denial of the right of the courts to enforce such obligations seems to rest upon the constitutional guarantee in Article XIV which protects all citizens of the United States against deprivation of property, "without due process of law."

WORKMEN'S COMPENSATION—ACCIDENT: WHAT IS ACCIDENTAL INJURY?—A traveling salesman on a business trip missed the bus which was to carry him to the train, his delay being due to his stopping to talk to a customer. He started to walk to the station, carrying two sample cases and a suitcase. He became excited through fear of losing the train, ran to the station and as a result of the exertion ruptured a blood vessel in his brain, causing paralysis. *Held,* he had suffered an accident within the Workmen's Compensation Act. *Crosby* v. *Thorp-Hawley Co., et al.* (Mich., 1919), 172 N. W. 535.

This decision is clearly within the rule established by decisions of the British courts, notably in the opinion of Lord Macnaughton in *Fenton* v. *Thorley* (1903), A. C. 443, 19 Times L. R. 684, holding such cases "accidental" on the broad ground of public policy. In fact the English cases have, in general, gone far beyond the previously accepted idea that accident and disease are mutually exclusive terms. In a recent case, *Coyle* v. *Watson* (1915), A. C. 1, the House of Lords held that a miner imprisoned in a shaft where he caught cold, took a chill, and developed pneumonia, had suffered an "accident" within the "usual and ordinary meaning of the term." Although Michigan decisions have not expressly adopted this doctrine and have not expressly overruled the case of *Feder* v. *Iowa State Traveling Men's Assoc.,* 107 Iowa 538, in which the court held that a man bursting a blood-vessel on reaching to close a window, did not suffer an "accident" within the terms of a general policy; yet some doubt is cast on the authority of this case. In a strong opinion in *Sullivan* v. *Modern Brotherhood,* 167 Mich. 524, 42 L. R. A. (N. S.) 140, Justice Stone held that infection of an eye by gonococci due to splashing of water while washing clothes is an accidental injury to the eye within the terms of the policy. The apparent tendency of recent decisions is to broaden the meaning of the term "accident." See L. R. A. 1916 A 29, 267, 1917 D 103, 1918 F 867.